

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS BROWN, Individually and On	:	Civil Action No. 1:07-cv-07895-DAB
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
CHINA SUNERGY CO. LTD., et al.,	:	
	:	
Defendants.	:	
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ADEL SHESHTAWY, Individually and On	:	Civil Action No. 1:07-cv-08656-DAB
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
CHINA SUNERGY CO. LTD., et al.,	:	
	:	
Defendants.	:	
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ANTHONY GIOMBETTI, et al., Individually	:	Civil Action No. 1:07-cv-09689-UA
and On Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiffs,	:	
	:	
vs.	:	
	:	
CHINA SUNERGY CO. LTD.,	:	
	:	
Defendant.	:	
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NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that class members Howard Hughes, Don Vandenneuval, Jie Wu and Andrew P. Van Gorder (the “Hughes Group”) will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing the Hughes Group as Lead Plaintiff; (iii) approving the Hughes Group’s selection of the law firms of Coughlin Stoia Geller Rudman & Robbins LLP and Schiffrin Barroway Topaz & Kessler, LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, the Hughes Group submits herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated November 9, 2007.

DATED: November 9, 2007

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

/s/ Mario Alba Jr.
MARIO ALBA JR.

SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA JR.
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

SCHIFFRIN BARROWAY TOPAZ
& KESSLER, LLP
STUART L. BERMAN
SEAN M. HANDLER
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610/667-7706
610/667-7056 (fax)

[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on November 9, 2007, I caused a true and correct copy of the attached:

Notice of Motion for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel;

Memorandum in Support of the Motion of The Hughes Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel; and

Declaration of Mario Alba Jr. in Support of the Motion of The Hughes Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

CHINA SUNERGY

Service List - 11/9/2007 (07-0229)

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Counsel For Defendant(s)

Legal Department
China Sunergy Co., Ltd.
c/o CT Corporation System
111 8th Avenue
New York, NY 10011

Legal Department
Cowen & Co., LLC
1221 Avenue of the Americas
New York, NY 10020

Legal Department
Jefferies & Co., Inc.
520 Madison Avenue, 12th Floor
New York, NY 10022

Counsel For Plaintiff(s)

Evan J. Smith
Brodsky & Smith, LLC
240 Mineola Blvd., 1st Floor
Mineola, NY 11501
516/741-4977
516/741-0626(Fax)

Samuel H. Rudman
David A. Rosenfeld
Coughlin Stoia Geller Rudman & Robbins LLP
58 South Service Road, Suite 200
Melville, NY 11747
631/367-7100
631/367-1173(Fax)

Kim E. Miller
Kahn Gauthier Swick, LLC
12 East 41st Street, 12th Floor
New York, NY 10017
212/696-3730
504/455-1498(Fax)

Lewis S. Kahn
Kahn Gauthier Swick, LLC
650 Poydras Street, Suite 2150
New Orleans, LA 70130
504/455-1400
504/455-1498(Fax)

CHINA SUNERGY

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Eric J. O'Bell
Law Offices of Eric J. O'Bell
3500 North Hullen Street
Metairie, LA 70002
504/456-8677
504/456-8624(Fax)

Stuart L. Berman
Sean M. Handler
Schiffrin Barroway Topaz & Kessler, LLP
280 King of Prussia Road
Radnor, PA 19087
610/667-7706
610/667-7056(Fax)